

REMARKS

The claims now pending in this application are Claims 1-3, 5-7, 9-30, 32-34, and 36-48, with Claims 1, 5, 9, 28, 32, and 42 being the independent claims. Claims 1-3, 5-7, 9, 11, 12, 18-20, 26, 28-30, 32-34, 36, 37, and 42 have been amended. No new matter has been added.

In the Official Action dated January 22, 2003, Claims 1-3, 11-19, 23-30, and 36-41 were rejected under 35 U.S.C. § 102(b) as being anticipated by Buchner (European Patent Application No. 0 911 808 A1). Claims 5-7, 9, 20-22, 32-34, and 42-48 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchner in view of well known prior art (MPEP 2144.03). Claim 10 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchner in view of well known prior art and further in view of European Patent Application No. 0 854 418 A2 (Hemphill). Reconsideration and withdrawal of the rejections respectfully are requested in view of the above amendments and the following remarks.

Initially, Applicant's attorney acknowledges the courtesies extended to her by the Examiner in conducting a personal interview on May 13, 2003. In that interview, Applicant's attorney, the Examiner, and the Examiner's supervisor discussed the independent claims and the cited art, European Patent Application EP 0 911 808 A1 (Buchner). Applicant's attorney explained the distinctions between the present invention and the cited art. However, the Examiner indicated that the Buchner patent is "still applicable" and he asserted that there are similarities between Figure 2 of that patent and Figure 1, item 3 of the present application.

Accordingly, the rejections of the claims over the cited art respectfully are traversed. Nevertheless, without conceding the propriety of the rejections, independent claims 1,

5, 9, 28, 32, 42 and the relevant corresponding dependent claims have been amended herein to further clarify the distinctions between the present invention and the cited art. Specifically, the claims have been amended to clarify the distinction between the machine dialog conducted by the processor-controlled machine and the spoken dialog conducted by the user. Further, the independent claims have been amended to clarify that the processor-controlled machine does not have prior knowledge of the spoken dialog conducted by the user.

Applicant submits that the present claims are allowable over the cited art for the reasons set forth at the personal interview. In particular Applicant submits that the cited art fails to disclose or suggest at least the features of interpreting received machine dialog interpretable instructions using a machine determined dialog (using the machine dialog compatible with the processor-controlled machine, in Claim 42) and communicating with a processor-controlled machine using the determined machine dialog to enable information to be provided to the user in response to the received machine dialog interpretable instructions, thereby enabling the user to conduct a spoken dialog with the processor-controlled machine.

The cited art also fails to disclose or suggest the feature of communicating with the processor-controlled machine to cause the processor-controlled machine to carry out a function defined by function information (defined by at least one function determined from the device class to be available on the processor-controlled machine, in Claims 5, 9, 32, and 42) in accordance with the spoken dialog conducted by the user with the processor-controlled machine, wherein *the processor-controlled machine does not have prior knowledge of the spoken dialog conducted by the user.*

The Buchner patent describes a speech interface in a home network environment in which all devices connected to a bus system are controlled by a single speech recognition device. In order to accomplish this, the single speech unit has to “know” the commands that are needed to operate all individual devices (see column 3, lines 41-50 of that patent). Initially, the speech unit “knows” a basic set of commands that are the same commands for various devices. A central processing unit (CPU) of that patent provides a learning function for the speech unit so that the speech unit can learn new vocabularies, grammars, and network commands. The CPU is bi-directionally coupled to an initial vocabulary section, an extended vocabulary section and an extended grammar section (see column 4, lines 46-59 of that patent). The CPU is also bi-directionally coupled to a device control unit controlling overall processing of a network device enabling user network commands and corresponding vocabularies and grammar stored in a memory of the network device to be downloaded into the extended vocabulary section and extended grammar section of the speech unit memory (see column 7, lines 47-55 of that patent). As such, all user network commands necessary to control a network device may be downloaded from the network device to the speech unit.

In Buchner, the vocabulary, user network commands and grammars necessary to control a particular network device are downloaded to the speech unit from the corresponding network device 11. This enables the user to control any of the network devices by spoken commands input to the microphone of the speech unit. The speech interface described in Buchner requires that each network device 11 be provided with all the user network commands necessary for its control together with the corresponding vocabulary and grammar. This requires that the supplier of the network device be familiar with the aspects of the voice control

arrangement so that the necessary user network commands and corresponding vocabulary and grammars can be provided in the network device for download to the speech unit 2 when the network device is coupled to the speech unit.

This arrangement is in direct contrast to the present invention which does not require the network device to provide such data or have any knowledge of the voice control arrangement but rather enables a supplier of the network device to provide a network device that has no familiarity with the aspects of the speech or voice control arrangement and, moreover, allows the control apparatus for enabling voice or speech control to the network device over the network to be developed independently of the network device without the control apparatus having to have any prior knowledge of the functionality of the machine before being coupled to the machine. See, for example, page 2, lines 19-25, page 2, lines 1-12, page 39, lines 1-18, page 2, lines 5-12, and page 39, lines 12-18 of the present application.

Since, in the present invention, the control apparatus provides the interface between the speech processing apparatus and the processor-controlled machine, the processor-controlled machine does not need to be aware of the fact that a spoken dialog is being conducted with the user. This is advantageous because the supplier of the processor controlled-machine does not need to be familiar with any aspects of the voice control arrangement and, in turn, the control apparatus does not need to be familiar with any aspects of the functionality of the processor controlled machine so that these two components can be developed independently.

Another distinction between the present invention and Buchner relates to the function of these two inventions. The invention disclosed in Buchner is not concerned with the communication between a processor-controlled machine and a control apparatus that enables that

processor-controlled machine to be *adapted* for voice control, as is disclosed in the present application. Rather, the Buchner patent relates to processor-controlled machines that are already adapted for voice control and that provide the necessary speech recognition grammars to the shared speech unit.

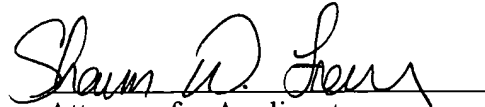
Accordingly, the present invention is allowable over the Buchner patent. The fact that JAVA is a known programming platform does not compensate for the deficiencies of the Buchner patent. Thus, Applicant submits that independent Claims 1, 5, 9, 28, 32, and 42 are allowable over the cited art.

The dependent claims depend from one or another of the independent claims and are believed allowable for the same reasons. Moreover, each of these dependent claims recites additional features in combination with the features of their respective independent claim and is believed allowable in its own right. Individual consideration of the dependent claims respectfully is requested.

Applicant believes the present Amendment is responsive to each of the points raised by the Examiner in the Official Action, and submits that the present application is in allowable form. Favorable consideration of the claims and passage to issue of the present application at the Examiner's earliest convenience earnestly are solicited.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Shawn W. Fraser", written over a horizontal line.

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